

EDWARD H. KUBO, JR. 2499
United States Attorney
District of Hawaii

THOMAS A. HELPER 5676
Assistant U.S. Attorney
Room 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, Hawaii 96850-6100
Telephone: (808) 541-2850
Facsimile: (808) 541-3752
E-mail: tom.helper@usdoj.gov

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, CHRISTOPHER)	CIVIL NO. 03-00567 JMS BMK
GAHR, FRANK ROBERT PAULSON,)	
CHARLES TURNER, and TOM)	DEFENDANT'S AMENDED EXHIBIT
YOUNG,)	LIST; CERTIFICATE OF SERVICE
)	
Plaintiffs,)	
)	
vs.)	
)	
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	Trial: April 24, 2007
SECURITY,)	Judge: J. Michael Seabright
)	
Defendant.)	
_____)	

DEFENDANT'S AMENDED EXHIBIT LIST

Defendant hereby submits its amended exhibit list, attached hereto, in the above-captioned matter. The defendant reserves the right to amend this exhibit list to include any and all items which may be relevant to this case and have been referenced in the discovery that have already been provided to the plaintiff.

DATED: March 27, 2007, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Thomas A. Helper
THOMAS A. HELPER
Assistant U.S. Attorney

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, et al.

DEFENDANT'S AMENDED EXHIBIT
LIST

vs.

MICHAEL CHERTOFF, Secretary,
Department of Homeland Security

CIVIL NO. 03-00567 JMS BMK

PRESIDING JUDGE:
Hon. J. Michael
Seabright

PLAINTIFF'S ATTORNEY:
Moses A. Aviles
G. Todd Withy

DEFENDANT'S ATTORNEY:
Thomas A. Helper

TRIAL DATE:
April 24, 2007

EXHIBIT NO.	DATE ADMITTED	DESCRIPTION
100		Memorandum from Filbert Carvalho to Lowery Leong, Re: MSF Supervisor, Christopher Gahr dated October 17, 2002
101		Patrick Collins Counseling Form dated October 18, 2002
102		Patrick Collins Counseling Form dated October 19, 2002
103		Patrick Collins Counseling Form dated October 20, 2002
104		Patti Igarashi Counseling Form dated October 20, 2002
105		Email from Chris Gahr to Filbert Carvalho dated October 20, 2002, 4:26 p.m.
106		Email from Chris Gahr to Filbert Carvalho dated October 20, 2002, 4:32 p.m.
107		Memorandum from Filbert Carvalho to Lisa Baker Re: MSF Supervisor Christopher Gahr dated October 21, 2002

108		Memorandum from Howard Tagamori to Lisa Baker Re: Termination Request/Concurrence dated October 25, 2002
109		Letter from Howard Tagamori to Lisa Baker dated October 25, 2002, regarding termination
110		Plaintiff Christopher Gahr's Answers to Defendant's Interrogatories
111		Affidavit of Christopher Gahr dated July 15, 2003, Exhibit to Report of Investigation by Department of Homeland Security Investigation of Complaint of Christopher Gahr, Complaint No. 7-03-6032
112		Appendix to Affidavit of Christopher Gahr dated August 12, 2003, Exhibit to Report of Investigation by Department of Homeland Security Investigation of Complaint of Christopher Gahr, Complaint No. 7-03-6032
113		Workplace Profile of Kahului Airport
114		Christopher Gahr Application for Classified Employment, San Bernardino County School District, from <u>Gahr v. San Bernardino City Joint Unified School District</u> , California Superior Court, San Bernardino County, Case No. SCV 33196
115		Deposition of Christopher Gahr in <u>Gahr v. San Bernardino City Joint Unified School District</u> , California Superior Court, San Bernardino County, Case No. SCV 33196 (WITHDRAWN except as necessary for impeachment or rebuttal)
116		Declaration of Christopher Gahr in <u>Gahr v. San Bernardino City Joint Unified School District</u> , California Superior Court, San Bernardino County, Case No. SCV 33196 (WITHDRAWN except as necessary for impeachment or rebuttal)
117		Screening Manager's Log Book for 2002

117A		Page 12 from Screening Manager's Log Book for 2002
118		Shift Summary Report for October 18, 2002

DATED: March 27, 2007, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

/s/ Thomas A. Helper
By _____
THOMAS A. HELPER
Assistant U.S. Attorney

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

LUCAS BRUNO III, CHRISTOPHER)	CIVIL NO. 03-00567 JMS BMK
GAHR, FRANK ROBERT PAULSON,)	
CHARLES TURNER, and TOM)	CERTIFICATE OF SERVICE
YOUNG,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MICHAEL CHERTOFF, Secretary,)	
DEPARTMENT OF HOMELAND)	
SECURITY,)	
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the date and by the method of service noted below, a true and correct copy of the foregoing was served on the following at their last known address:

Served by First Class Mail:

Moises A. Aviles	March 27, 2007
Aviles & Associates	
560 N. Arrowhead Ave., Suite 2A	
San Bernardino, CA 92401	

Served Electronically through CM/ECF:

G. Todd Withy	March 27, 2007
Withylawcourt@aol.com , withylaw@aol.com	

Attorneys for Plaintiff
CHRISTOPHER GAHR

DATED: March 27, 2007, at Honolulu, Hawaii.

/s/ Coleen Tasaka-Shoda
